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10 Attorneys for Plaintiffs

11 UNITED STATES DISTRICT COURT
12 FOR THE NORTHERN DISTRICT OF CALIFORNIA

13 DISTRICT COUNCIL 16 NORTHERN
14 CALIFORNIA HEALTH AND WELFARE
15 TRUST FUND, et al.,

16 Plaintiffs,

17 v.

18 ADVANCED CONCRETE TECHNOLOGIES,
19 INC., aka ADVANCED CONCRETE TECH,
20 INC., and MATTHEW SCOTT RAINES,

21 Defendants.

Case No.: C08-4430 WHA

**NOTICE OF VOLUNTARY DISMISSAL
OF DEFENDANT MATTHEW SCOTT
RAINES**

22 PLEASE TAKE NOTICE that pursuant to F.R.C.P., Rule 41(a)(1), plaintiffs DISTRICT
23 COUNCIL 16 NORTHERN CALIFORNIA HEALTH AND WELFARE TRUST FUND, et al.,
24 voluntarily dismiss, without prejudice, their claim against Defendant MATTHEW SCOTT
25 RAINES (“Raines”). Raines has neither served an answer nor moved for summary judgment, and
26 plaintiffs have not previously filed or dismissed any similar action against Raines.

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1 It is therefore requested that Defendant MATTHEW SCOTT RAINES be dismissed
2 without prejudice.

3 I declare under penalty of perjury that I am the attorney for the plaintiffs in the above
4 entitled action, and that the foregoing is true of my own knowledge.

5 Executed this 11th day of March, 2009, at San Francisco, California.

6
7 SALTZMAN & JOHNSON
8 LAW CORPORATION

9 By: _____/s/_____
10 Shaamini A. Babu
11 Attorneys for Plaintiffs

12 IT IS SO ORDERED.

13 Defendant MATTHEW SCOTT RAINES is dismissed without prejudice.

14 Date: March 16, 2009
15 _____

16 UNITED STATES DISTRICT COURT JUDGE



PROOF OF SERVICE

I, the undersigned, declare:

I am a citizen of the United States and am employed in the County of San Francisco, State of California. I am over the age of eighteen and not a party to this action. My business address is 44 Montgomery Street, Suite 2110, San Francisco, California 94104.

On March 11, 2009, I served the following document(s):

**NOTICE OF VOLUNTARY DISMISSAL OF
MATTHEW SCOTT RAINES**

on the interested parties in said action by First Class U.S. Mail by placing a true and exact copy of each document in a sealed envelope with postage thereon fully prepaid, in a United States Post Office box in San Francisco, California, addressed as follows:

**Matthew Scott Raines
428 East Thunderbird Road #509
Phoenix, AZ 85022**

**Advanced Concrete Technologies, Inc.,
aka Advanced Concrete Tech, Inc.
2103 Presidio Court
Danville, CA 94526**

**Advanced Concrete Technologies, Inc.,
aka Advanced Concrete Tech, Inc.
c/o Matthew Raines
428 East Thunderbird Road #509
Phoenix, AZ 85022**

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed on this 11th day of March, 2009, at San Francisco, California.

_____/s/_____
Qui X. Lu